

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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UNITED STATES OF AMERICA	§	
	§	Case No: 3:12-CR-413-L
v.	§	3:13-CR-030-L
	§	Hon. Sam A. Lindsay
BARRETT LANCASTER BROWN	§	

**AGREED MOTION TO CONTINUE PRETRIAL DEADLINES**

Defendant BARRETT LANCASTER BROWN files this agreed motion for a continuance and in support thereof, would show the Court the following:

I.

This matter is presently scheduled for a trial on May 19, 2014. The Court has set a deadline of February 28, 2014 for the filing of pretrial motions, and March 14 for responses. *Id.*

The undersigned has encountered an unexpected issue that may not allow timely filing on February 28, 2014. A continuance of **one business day** is needed to address the issue. The continuance would move the pretrial motions deadline to March 3, 2014 and the deadline for responses to March 17, 2014.

The continuance will not effect any hearing or trial dates. The undersigned has conferred with counsel for the government, who is in agreement with this request.

II.

WHEREFORE, PREMISES CONSIDERED, Defendant Brown moves to continue the pretrial motions deadlines by **one business day** to March 3, 2014 for pretrial motions and March 17, 2014 for responses. Counsel for the government is in agreement with this request.

Respectfully submitted,  
-s- Ahmed Ghappour  
AHMED GHAPPOUR  
*Pro Hac Vice*  
Civil Rights Clinic  
University of Texas School of Law  
727 East Dean Keeton St.  
Austin, TX 78705  
415-598-8508  
512-232-0900 (facsimile)  
aghappour@law.utexas.edu

CHARLES SWIFT  
*Pro Hac Vice*  
Swift & McDonald, P.S.  
1809 Seventh Avenue, Suite 1108  
Seattle, WA 98101  
206-441-3377  
206-224-9908 (facsimile)  
cswift@prolegaldefense.com

MARLO P. CADEDDU  
TX State Bar No. 24028839  
Law Office of Marlo P. Cadeddu, P.C.  
3232 McKinney Ave., Suite 700  
Dallas, TX 75204  
214.744.3000  
214.744.3015 (facsimile)  
mc@marlocadeddu.com  
*Attorneys for Barrett Lancaster Brown*

CERTIFICATE OF CONFERENCE

I certify that on February 28, 2014, I conferred with Ms. Candina Heath, counsel for the government and she is in agreement with the relief requested.

/s/ Ahmed Ghappour  
AHMED GHAPPOUR  
/s/ Charles Swift  
CHARLES SWIFT  
/s/ Marlo P. Cadeddu  
MARLO P. CADEDDU  
*Attorneys for Barrett Lancaster Brown*

CERTIFICATE OF SERVICE

I certify that today, February 28, 2014, I filed the instant motion using the Northern District of Texas's electronic filing system (ECF) which will send a notice of filing to all counsel of record.

/s/ Ahmed Ghappour

AHMED GHAPPOUR

/s/ Charles Swift

CHARLES SWIFT

/s/ Marlo P. Cadeddu

MARLO P. CADEDU

*Attorneys for Barrett Lancaster Brown*